

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**UNITED STATES OF AMERICA  
PLAINTIFF**

**v.**

**BERNETTA WILLIS,  
DEFENDANT**

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**CR. NO. 2:06-CR-00129-001**

**MOTION TO DISMISS COMPLAINT AND WITHDRAW AS COUNSEL**

Comes now Defendant, by and through her counsel of record, and moves the Court to dismiss the complaint filed against her by the United States charging her with violations of Title 18 U.S.C. §§ 3, 1071 and 1001 and in support thereof states to the Court as follows:

1. On November 17, 2006, the United States filed a complaint charging Defendant with violations of Title 18 U.S.C. §§ 3, 1071 and 1001.
2. Defendant appeared for initial appearance on November 11, 2006 at which time a detention hearing was set for November 22, 2006.
3. At the conclusion of the detention hearing, defendant was ordered detained and was bound over to the District Court for further proceedings.
4. During a phone conversation with AUSA Chris Snyder on January 8, 2007, counsel for Defendant learned the Government has determined that it would not refer the complaint to the Grand Jury and the matter is now in a state of de facto termination.
5. Counsel for Defendant moves the Court for an order dismissing the complaint in order to bring finality to the case thereby allowing for the filing of CJA documentation.

Wherefore the above matters considered, defendant prays this Court grant her motion and issue an order dismissing the complaint against her.

Respectfully submitted this day, January 11, 2007.

/s/Timothy C. Halstrom

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Bar Number HAL021  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2007 filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing parties and their attorneys.

/s/Timothy C. Halstrom

Timothy C. Halstrom  
Bar Number HAL021